

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN COUNCIL OF LEARNED
SOCIETIES, *et al.*,

Plaintiffs,
v.

MICHAEL MCDONALD, in his official
capacity as Acting Chairman of the National
Endowment of the Humanities, *et al.*,

Defendants.

Case No. 1:25-cv-03657

DECLARATION OF RICHARD ROE

I, Richard Roe,¹ declare as follows:

1. I am a current employee of the National Endowment for the Humanities (NEH).

In early February of 2025, we were informed that the new administration was planning to terminate grants made during the Biden administration that violated the new Executive Orders on K-12 education, gender ideology, and DEI. The staff spent weeks combing through thousands of grants and indicating which ones might be considered in violation of the new EOs. We estimated that roughly 25% of grants were in violation of the new EOs and would likely be terminated.

2. In early April of 2025, almost all grants awarded during the Biden administration (nearly 1500 NEH grants) were terminated. These termination notifications came from a Microsoft email account outside the NEH grants management or email systems. Staff was given no warning of these terminations. Following these terminations, staff members were told by NEH leadership, including Acting Chairman Michael McDonald, that Nate Cavanaugh and Justin Fox from DOGE had chosen the grants to be terminated and sent the termination notices

¹ Richard Roe is a pseudonym. I am submitting this declaration anonymously out of fear that I would be retaliated against if I used my real name.

themselves. My understanding is that Acting Chairman McDonald's involvement in the grant terminations was, at most, to ask DOGE not to terminate a relatively small number of grants that they had selected as important for the nation's semiquincentennial celebrations.

3. The day after the termination notifications went out, NEH staff were informed that 75% of the agency was being laid off through a Reduction-in-Force (or RIF) and most people were sent home on administrative leave. As the RIF progressed, it became clear just how few staff were left across the entire agency (e.g., only 8 program officers; only 4 grants management specialists) who now have to process the termination of almost 1500 awards while also continuing to run a small number of programs and designing new programs for the administration. The RIF is due to end on June 10th, at which point the NEH leadership will decide how to restructure the agency and which programs will continue. As of now, the Office of Digital Humanities has been told that it will no longer exist after June 10th and the remaining staff have been detailed to other offices. The Office of Partnerships and Strategic Initiatives, the Office of Communications and Publications, and the Office of Data and Evaluation have all been eliminated. Other departments, such as the Office of Planning and Budget or the Division of Education Programs, have been reduced down to one or two staff members and are barely functioning.

4. Almost all awards from our November 2024 meeting of the National Council on the Humanities were terminated by DOGE, and very few awards were made from our March 2025 meeting (we have only three grant meetings a year in which to spend our Congressional appropriations: November, March, and July). Most divisions are not bringing any applications to the July 2025 Council meeting for funding. The NEH has so far spent less than \$10 million of

our \$200+ million allocation for fiscal year 2025. It seems unlikely that we will spend even half of the allocation before the end of the fiscal year (September 2025).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 14, 2025 in Washington, D.C.

/s/ Richard Roe

Richard Roe